

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Proposed Amendments to Filing Instructions

Docket No. RM2003-1

**COMMENTS OF AMERICAN POSTAL WORKERS UNION, AFL-CIO (APWU)
REGARDING NOTICE OF PROPOSED RULEMAKING CONCERNING EVIDENCE
SUPPORTING RATE AND CLASSIFICATION CHANGES**

(January 15, 2003)

The APWU welcomes the roadmap concept for complex rate filings; however, its value may diminish if it is the product of a single witness. The roadmap will contain the knowledge and understanding of a single person. The designated witness may (and should) be reluctant to proffer information the witness does not fully comprehend. Attorneys reviewing the testimony may become overly concerned about wording, inclusion or exclusion of information and other matters because the roadmap is evidence. As testimonial evidence, it becomes subject to interrogatories and oral cross-examination. The roadmap should not become another layer of complexity in rate filings.

The roadmap (§3001.53 (b) Overview of filing) should be an institutional document - not the testimony of a single witness and not evidence. Rather than have parties use formal discovery, the Postal Service has been responsive (and may prefer) that parties pickup the phone and ask them questions. The Service ought to include in the roadmap such an invitation with contact information for various parts of the case. Informal inquiries should be the preferred method of clarifying matters concerning the roadmap.

With regard to proposed language in §3001.53 (b), APWU proposes to strike "As part of its direct evidence" and where "piece of testimony" and "testimony" appear, substitute "document." The APWU supports the proposed language in §3001.53 (c) as written. The material described in §3001.53 (c) should be treated as evidence.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice.

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